

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TZEW HOLDCO LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 20-10910 (CSS)
)
) (Jointly Administered)
)
) **Re: Docket No. 136**

**CERTIFICATION OF NO OBJECTION REGARDING DEBTORS' MOTION SEEKING
ENTRY OF AN ORDER (I) AUTHORIZING THE REJECTION OF A CERTAIN
UNEXPIRED LEASE AS OF APRIL 30, 2020, (II) AUTHORIZING THE
ABANDONMENT OF CERTAIN PERSONAL PROPERTY, EFFECTIVE
AS OF APRIL 30, 2020, AND (III) GRANTING RELATED RELIEF**

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection or other responsive pleading to the final relief requested in the *Debtors' Motion Seeking Entry of an Order (I) Authorizing the Rejection of a Certain Unexpired Lease as of April 30, 2020, (II) Authorizing the Abandonment of Certain Personal Property, Effective as of April 30, 2020, and (III) Granting Related Relief* (the "Motion") [Docket No. 136] filed on April 30, 2020 with the U.S. Bankruptcy Court for the District of Delaware (the "Court").

Pursuant to the *Notice of Debtors' Motion Seeking Entry of an Order (I) Authorizing the Rejection of a Certain Unexpired Lease as of April 30, 2020, (II) Authorizing the Abandonment of Certain Personal Property, Effective as of April 30, 2020, and (III) Granting Related Relief* (the "Notice") [Docket No. 136], responses to the relief requested in the Motion were to be filed and served no later than May 14, 2020 at 4:00 p.m. prevailing Eastern Time. The

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Apex Parks Group, LLC (5579); Apex Real Property Holdings, LLC (1013); Speedzone Beverage Company, LLC (2339); Speedzone Holdings, LLC (7913); Speedzone Management, LLC (2937); TZEW Holdco LLC (0252); and TZEW Intermediate Corp. (1058). The location of the Debtors' service address in these chapter 11 cases is: 18575 Jamboree Road, Suite 600, Irvine, CA 92612.

undersigned further certifies that he has caused the Court's docket in this case to be reviewed and no answer, objection or other responsive pleading to the relief requested in the Motion appears thereon.

It is hereby respectfully requested that the proposed order attached hereto as **Exhibit A** be entered at the Court's earliest convenience.

Dated: June 1, 2020

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Timothy P. Cairns

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